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Subject: Farm Bill comments: Maine Forest Service
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The following comments are submitted on behalf of the Maine Forest Service.

Best regards,
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We help you make informed decisions about Maine's forests

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December 2005
Secretary of Agriculture Mike Johanns
ATTN: Farm Bill
1400 Independence Avenue SW
Washington, DC 20250-3355
Department of Conservation - Maine Forest Service
Comments on 2007 Farm Bill
Dear Secretary Johanns:
The Maine Forest Service offers the following comments on the 2007 Farm Bill.
Maine's forests both support and define our quality of life. Maine people avidly pursue outdoor recreational activities of all types and care deeply about the forests which provide the setting for many of these services. Our vast forests support a diverse forest products industry both in the state and across the region. Maine's forests generate over \$6 billion in direct economic activity by the forest products industry, and have a \$10 billion impact on the state's economy. Recreation activities contribute another \$1 billion. Our forests account for half of the total wood production in the four state region comprising northern New England and New York. Maine forests have economic value for a wide range of uses, from pulp and paper to dimension lumber to high value secondary products. Continued federal investments in Maine's forests via the Farm Bill are appropriate and necessary to maintain these values. Millions of people live within a day's drive of Maine's forests. Many of them value our forests for recreation, solitude, hunting, and fishing. All of these activities together generate millions of dollars of economic activity every year. These activities connect Maine's forests to the health

and well-being of people in cities far away. Maine's forests provide watershed protection for our exceptionally unsullied rivers and lakes, which are the source of clean drinking water supplies for local communities and distant cities as well as superior fisheries. These forests also help to clean our air, stabilize our climate, and provide important wildlife habitat. Forests also have intangible values for our communities, including quality of life and sense of place. Our forests drive our economy, our quality of life, and our sense of place. They are worthy of a significant federal investment through the Farm Bill.

Critical Natural Resource and Economic Issues

We have identified several key, often interrelated issues that, in our view, the Farm Bill ought to address. Our overarching interest is to maintain a sustainably managed, economically viable forest land base and forest products industry, while protecting the traditional uses and other forest values Maine people cherish.

* Conversion and Parcelization: Conversion of forest land to development and parcelization makes good forest management less likely and more difficult. This is a big issue in southern and central Maine, and the trends are disturbing. In fact, the recent USDA Forest Service report, "Forests on the Edge," identified three large watersheds in Maine as among the top twenty in the nation for projected future development.

* Changing ownership and management objectives: Industrial forest owners have sold their land base to investors who are seeking to maximize returns and who generally plan on holding the land for 10-15 years as opposed to decades.

* Inadequate returns from long-term forest management: The returns do not justify either retaining forest land, if other uses are possible, or practicing long-term silviculture. Research at the Penobscot Experimental Forest indicates that the present value of stands managed for long-term productivity is about half that of stands subjected to diameter limit cutting, even though these practices diminish the long-term productivity of the land.

* Maintaining and improving the long-term viability of the forest based economy: We've faced the loss of mills, declining industry employment, fewer loggers, and consequent impacts on forest-based communities. At the same time, we have some sectors where we excel, and we have a number of significant opportunities, e.g., expanding the use of biomass fuels and producing biofuels and wood-based chemical feedstocks.

* Insect and disease threats: Our forests face a number of existing and potential threats, many of them from exotic pests that have arrived

in
this country due to lax monitoring of imported products and dunnage.
These
threats include the hemlock woolly adelgid, sudden oak death, and
emerald
ash borer.

Umbrella Principles for the 2007 Farm Bill

We encourage you to develop the 2007 Farm Bill with the following
principles

in mind. We believe these principles are necessary conditions for
effective, efficient delivery of programs to the people of Maine.

* State forestry agencies should be the lead agency for
implementation and delivery of federal programs addressing forests and
forest landowners. We are focused on forestry issues, and we have
qualified
personnel, local credibility, and contacts with the affected interests.

We
have a proven track record of fair and efficient program delivery. We
are
accountable, nimble, adaptive, and responsive to our customers' needs.

* Funding for forest landowner assistance and other forestry
programs should be provided at an adequate, consistent level to enable
us to
get the job done. Current programs are funded inconsistently and
inadequately. Inadequate funding limits the services and geographic
range

that can be served, resulting either in geographic inequities or lower
program impact across a wider area. Inconsistent funding dilutes
awareness

and discourages interest and participation by the very people federal
programs are intended to help.

* Federal programs that overlap and could provide similar types
of
assistance and/or target similar audiences should be coordinated to
maximize
effectiveness and efficiency. Some overlap in federal programs may be
unavoidable if all important constituencies are to be served and
resource
needs met; however, independently conducted, overlapping programs can
create
inefficiencies, confusion, and result in unnecessary expenditures of
scarce

taxpayer resources. Therefore, programs must be sufficiently flexible
in
how they are delivered to allow effective coordination and avoid similar
programs with incompatible rules. Program flexibility will allow agency
partnerships and adaptive program delivery strategies that can maximize
combined program effectiveness and public benefits, while reducing costs
and
stretching limited resources.

* The federal government should support economic revitalization
of
rural communities based on the sustainable use of natural resources.

There
is a strong connection between healthy forests, good stewardship, and
prosperous forest communities. A strong program aimed at rural
development
through forestry increases the return on other federal investments in
forest
health, fire, and landowner assistance.

* Federal landowner assistance programs should focus on supporting actions by landowners that support long-term stewardship and increase long-term productivity and value. Forest management is a long-term endeavor fraught with risks unknown to other investors. In addition, the investment playing field and federal policies do not favor "patient capital," and many forestland investors seek to realize a financial return on their investment long before the fruits of careful management can be reaped. The actively managed forest land base likely will continue to erode, and the public benefits of well-managed forests will decline, unless federal policies are changed to encourage the retention of forest land as forest and improve the economic viability of investments in long-term forest management.

* Federal land conservation programs should be adequately and consistently funded and focus on the acquisition of working forest easements. Working forest easements, particularly in sensitive riparian settings, add tremendous value to other natural resource conservation efforts. For example, managed forested watersheds are the most compatible land-use type for public and private drinking water source protection and Atlantic salmon habitat conservation. Working forest easements that promote sustainable forest management, including but not limited to, retention of tree species diversity and multiple age classes: 1) enhance forest canopy response and recovery rates from catastrophic weather events; 2) demonstrate greater resilience to insect and disease outbreaks; 3) provide streambank stability; and, 4) moderate and mitigate stormwater runoff from increasingly frequent significant rainfall events. USDA's Healthy Forest Initiative, Title III - Watershed Forestry Assistance provides a vehicle for efforts to provide such management, but has not been funded.

* Community forestry programs should be funded adequately and consistently. Community forests provide clean air, clean water, recreation opportunities, and improved quality of life to over 80% of the nation's population. As population levels increase and historically rural farm and forest land is developed into smaller urbanized parcels, it is critical for communities to manage their forest resources to maintain their values to the community and the ecosystem services they provide. Federal policy can achieve conservation and environmental goals by supporting urban and community forestry planning and management activities. The USDA Forest Service and each state maintain an urban and community forestry program that helps communities manage their forestry resources. Nevertheless, the national program is inadequately funded to meet current and future

community
forestry management needs. The national urban and community forestry
program should be well funded and other opportunities to support
establishment and management of community forests should be explored.
Thank you for your consideration of these comments. If you have any
questions, please contact me.

Sincerely,

R.

Alec
Giffen

Director,
Maine Forest Service
cc: Governor Baldacci
Senator Snowe
Senator Collins
Rep. Allen
Rep. Michaud